

## Memorandum

To : Oleta Melnicoe,  
Lead SB950 Registration Specialist

Date : November 12, 1991

Adolfo Gallo,  
SB950 Registration Specialist

Place : Sacramento

Telephone : 4-0533

From : Department of Pesticide Regulation -  Carol Cummins, Supervisor of Registration  
Pesticide Registration Branch

Subject: SB950 Data Waiver Requests - Procedures  
SB950 Exemption Requests - Screening

All requests to waive SB950 data requirements and requests for exemption from the data requirements under Section 13127 (e) shall be discussed with me. We will determine which procedure is appropriate, that for a waiver or an exemption request. When routing as an exemption request, the procedures in my memo of November 6, 1991 are appropriate.

### SB950 Requests to Waive Data Requirements - Procedures

All requests to waive one or more of the SB950 data requirements shall be routed to the Worker Health and Safety Branch (WH&S) and to the Medical Toxicology Branch (Med Tox). Decisions to waive SB950 studies will be the responsibility of Med Tox based on an exposure assessment conducted by WH&S.

Requests for waivers of data requirements must be specific, in writing, and accompanied by appropriate supporting information and documentation. The Registration Specialists assigned to SB950 will review each request to determine whether it is complete. We will discuss each request before it is routed or, if incomplete, denied.

### Routing

WH&S - all requests will be routed first to WH&S for an exposure assessment. When the Registration Specialist receives a written assessment from WH&S, the request is routed to Med Tox.

Med Tox will make a decision to grant or deny the request. Their decision will be in writing and include the reasons why conditions do or do not warrant granting the request.

Office of Environmental Health Hazard Assessment (OEHHA) - all decisions to waive SB950 data requirements will be communicated to OEHHA prior to noticing the decision for public comment.

Denial of Data Waiver Request

A request will be denied when:

The request is incomplete because it is not specific and does not include supporting information and documents.

Med Tox determines the request can not be granted

Granting a Data Waiver Request

A request will be granted when:

Med Tox makes a written decision to grant the request

The decision to waive the data has been communicated to OEHHA

A public notice of this decision will be posted for 30 days.

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